

POSTED
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BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET No. 2001-65-C

IN THE MATTER OF:

Generic Proceeding to Establish Prices
For BellSouth's Interconnection Services,
Unbundled Network Elements and Other
Related Elements and Services

SURREBUTTAL TESTIMONY OF

JERRY WILLIS

ON BEHALF OF

New South Communications, NuVox Communications, Broadslate Networks,
ITC^DeltaCom Communications, KMC Telecom

June 14, 2001

RETURN DATE: OC DBW
SERVICE: OC DBW

Q. PLEASE STATE YOUR NAME FOR THE RECORD.

A. My name is Jerry Willis.

Q. ARE YOU THE SAME JERRY WILLIS WHO PREVIOUSLY FILED DIRECT TESTIMONY IN THIS PROCEEDING ON JUNE 4, 2001?

A. Yes, I am.

Q. PLEASE RESPOND TO MR. SHELL'S COMMENTS ON PAGE 3, LINE 10 OF HIS REBUTTAL TESTIMONY THAT YOUR DESCRIPTION OF THE COLLOCATION PROCESS "IS AT A VERY HIGH AND SIMPLISTIC LEVEL".

A. The description of the collocation process is by necessity "simplistic" based on BellSouth's failure to provide any level of detail in support of their work times or any description of the tasks performed in completing the collocation process. Without such information, BellSouth's wholesale customers – and this Commission – are unable to critique or analyze the work time specifics or the tasks that comprise the collocation process in any manner other than a very high level.

Q. DO YOU AGREE WITH THE CONTENTION MADE BY MR. SHELL ON PAGE 3 LINES 11 THROUGH 18 THAT IT IS LIKELY THAT SEVERAL JOBS ARE OCCURRING IN A CENTRAL OFFICE AT ANY GIVEN TIME?

A. No. Mr. Shell suggests that BellSouth continuously hosts multiple collocation projects in a central office requiring constant meetings and coordination between numerous engineering groups. BellSouth's cost study indicates otherwise. According to the cost study, the average number of collocators per central office is 3.5. Given the fact that collocation expansion has all but come to a standstill for the past year, I believe the

1 amount of on-going expansion jobs Mr. Shell suggests is inflated. We should be setting
2 rates for today's environment, not the environment of two years ago.

3 During my 35-year career in telecommunications I have held positions as a central office
4 engineer and managed several engineering departments. I am fully aware that no one
5 person has complete knowledge of all required information for a collocation in a central
6 office. However, the information on a central office is maintained in electronic or paper
7 Engineering Records. As each step of the process is completed BellSouth updates the
8 records. To suggest that the building engineer or power engineer would process an
9 equipment expansion or rearrangement and not update the floor plan or office load chart
10 is not practical or logical. Failure to do so would result in complete disarray in a very
11 short time.

12 **Q. MR. SHELL NOTES THAT A WALK-THROUGH OF THE COLLOCATION**
13 **SPACE SHOULD BE SCHEDULED? (PAGE 3, LINES 23-25) DID YOU OMIT**
14 **THIS STEP INTENTIONALLY?**

15 **A.** Yes. However, in our experience at NuVox involving 200+ initial applications, the space
16 acceptance task did not represent a significant time commitment on BellSouth's behalf. A
17 typical walk through was usually accomplished in less than 20 minutes. Frequently the
18 BellSouth representative performing the walk through was a technician or administrative
19 employee rather than the central office manager.

20 **Q. IN HIS REBUTTAL TESTIMONY, MR. SHELL ATTEMPTS TO "DEFINE"**
21 **THE SPECIFIC COST ELEMENTS FOR THE APPLICATION FEE – INITIAL**
22 **(PAGE 4, LINE 9). DOES MR. SHELL'S DEFINITION PROVIDE ANY MORE**

1 **INFORMATION REGARDING THE WORK ON WHICH THESE COST**
2 **ELEMENTS ARE BASED?**

3 A. No. Mr. Shell simply restated his original testimony, again using vague generalities. The
4 various activities listed offer no evidence to establish that the hours allocated by
5 BellSouth in its cost study are warranted. In the following discussion I refer to Exhibit
6 JW-1 in my original testimony.

7 Reviewing application for accuracy.

8 Mr. Shell offers no justification for the 11 hours allocated to BellSouth's ATCC to
9 process the application. After the eAPP system checks the application, there is little
10 information the ATCC can verify.

11 The application is composed of 12 pages with 18 sections that cover all potential
12 configurations of collocation. Exhibit JW-1 has entries on only nine pages with the
13 majority of these entries composed of entering a "X" in a Yes or No field and
14 administrative information such as addresses, contact names and telephone numbers. The
15 entry requiring the most time to input is the equipment information. The ATCC does not
16 have the data available to verify this information. There are many equipment vendors and
17 equipment from each vendor can be configured in various ways. The ATCC does not
18 have the data needed to verify the part numbers, heat dissipation and power consumption
19 of the listed equipment. The remaining information involves specifying quantities of
20 interconnecting cable pairs and administrative information. I stated in my initial
21 testimony that the time required of NuVox in collecting the required information and
22 entering that information into the eAPP system for an initial application requires about 30

1 minutes. Based on the actual information the ATCC can verify it should require no longer
2 than 10 minutes to conduct the review.

3 Discussing application with applicant.

4 In my experience, this step seldom occurs. When the ATCC has a question they typically
5 pose the question by placing phone call or sending an e-mail to NuVox. This usually
6 requires no longer than 5 minutes.

7 Processing application.

8 Mr. Shell offers no description of the activity involved in “processing the application.”

9 From my experience, the other steps in the list of activities are the application processing.

10 BellSouth should be required to provide the time, if any, allocated to this task.

11 Distributing application to other departments.

12 The application process is electronic. In an automated system, distribution is achieved by
13 clicking a selection of the department(s) that should receive the application and another
14 click to send the application. Based on experience we all have in using automated
15 systems and the Internet, this does not require more than 1 – 2 minutes.

16 Review of application by different departments.

17 This activity involves some of the nine work groups mentioned in Mr. Shell’s testimony.

18 However, not all nine workgroups identified in the cost study are involved in every
19 application. Only those work groups affected by the specific request from the CLEC
20 customer are involved. The cost study assumes that all nine work groups are involved
21 with every application, which is one of the factors contributing to the inflated initial
22 application charges.

1 Compilation of responses on the specific application.

2 Again, BellSouth fails to provide supporting facts for this activity. The eAPP is an
3 automated system. Based on my experience with automated systems, as the engineers for
4 the various central office systems complete their work they would enter cost and interval
5 estimates into the eAPP system. The Customer Inquiry Response (CIR) that is returned to
6 the CLEC is a HTML screen shot sent by the ATCC via e-mail. A logical assumption is
7 that this time should be or is included. BellSouth has failed to provide the time allocated
8 for this activity.

9 Mr. Shell states in his testimony page 4, lines 21 – 25, that the basis for our earlier
10 statement that the work time identified by BellSouth is much more than what should
11 reasonably be required is based on BellSouth providing a simple “yes” or no answer. Mr.
12 Shell’s assumption about my statement is incorrect. The facts outlined in my previous
13 testimony provide actual work experiences of time required for various activities.
14 Additionally, the fact that the time of nine workgroups, as pointed out by Mr. Shell,
15 contributes to the Application Fee - Initial is evidence that the cost is inflated. Why
16 should a CLEC be required to pay for time allocated to a workgroup if that workgroup is
17 not affected by the CLEC’s request for collocation?

18 **Q. ON PAGE 5, LINES 15-24, MR. SHELL NOTES THE COMMISSION’S PRIOR**
19 **UNE ORDER IN SUPPORT OF BELL SOUTH’S PROPOSED APPLICATION**
20 **FEE? IS THIS APPROPRIATE?**

21 **A.** No. Mr. Shell’s reliance on the previous UNE Order (97-374-C, and Order No. 98-214)
22 is not appropriate justification for the charges proposed in this docket. During 1997 and
23 1998 local competition was in its infancy. ILECs and CLECs were in the process of

1 developing cost models, contractual agreements and work processes. The processes have
2 been greatly improved for 2001 as witnessed by the development and use of the eAPP
3 system by BellSouth. Reference to the previous UNE Order is not appropriate in this
4 case.

5 **Q. DOES IT APPEAR THAT MR. SHELL MISINTERPRETED YOUR**
6 **TESTIMONY IN HIS STATEMENT (PAGE 6, LINES 14-19) THAT THE**
7 **APPLICATION RESPONSE AND THE SPACE PREPARATION FEE RECOVER**
8 **COSTS FOR DIFFERENT ACTIVITIES?**

9 A. No. Mr. Shell is confused. In my direct testimony, I stated exactly what Mr. Shell's
10 response described. The Application Fee - Initial (currently \$4,850) is intended to cover
11 the cost of preparing a response to the CLEC's initial application. This response includes
12 estimated cost, time intervals and a preliminary floor plan. The Space Preparation Fee
13 includes the actual engineering and physical work performed by BellSouth after receipt
14 of the Firm Order. The Space Preparation Fee is exclusive of the Application Fee --
15 Initial.

16 **Q. ON PAGE 7 OF HIS REBUTTAL TESTIMONY MR. SHELL INDICATES THAT**
17 **A SIGNIFICANT AMOUNT OF MANUAL EDITING IS REQUIRED TO THE**
18 **EAPP BECAUSE A REPRESENTATIVE FROM THE ATCC MUST "VALIDATE**
19 **THE APPLICATION IS CORRECT" AND "ASSURE THAT THE**
20 **APPLICATION IS VALIDATED" BEFORE OTHER GROUPS BEGIN**
21 **REVIEWING THE APPLICATION. DOES THIS MAKE SENSE?**

22 A. Based on our experience using the eAPP system, Mr. Shell's statement that the eAPP
23 system performs audits only for fields with missing data and letters where numbers

1 should be is an oversimplification. The eAPP system check performed for missing data
2 is more comprehensive than indicated in Shell's testimony.

3 For example:

- 4 • If the CLEC employee entering data indicates in Section 3 that this is an initial
5 arrangement by entering an X at that question, but omits the floor space
6 information required in Section 4, the eAPP system will reject the application.
- 7 • If the applicant enters an X in the Yes box in Section 7A2 (-48V Power and
8 Grounding) and does not complete Section 7C (quantity of breakers requested)
9 the system rejects the application.

10 Mr. Shell continues that the ATCC must still "validate that the application is correct" and
11 "assure that the application is validated". How are these two tasks different from one
12 another? This is just another example of BellSouth allocating time for tasks that are not
13 necessary. Additionally, BellSouth should not be allowed to lump the time allotted for all
14 work groups into a single charge. To allow this requires CLECs to pay for a work
15 group's time even when the application does not require any evaluation or input from
16 that work group.

17 As Mr. Shell states that the eAPP system is designed to make it easier and more efficient
18 for the distribution of applications and firm orders. This is the very basis of our request
19 that BellSouth be required to reconsider and justify the time allocations in their cost
20 study. Overnight courier service, copying and faxing previously required to process an
21 application is eliminated by the eAPP system.

Q. DOES MR. SHELL'S EXPLANATION OF THE NEED FOR 20 HOURS OF REVIEW FOR THE INAC ON PAGES 7 AND 8 PROVIDE SUFFICIENT INFORMATION TO JUSTIFY THAT AMOUNT OF TIME?

A. No. Although the INAC functions as the coordinator for the Network-related groups within BellSouth, the INAC does not serve as the technical consultant to the CLECs, as stated by Mr. Shell. The Competitive Coalition members have internal engineering departments and other technical support sources to rely on.

Q. HOW ELSE IS MR. SHELL'S EXPLANATION DEFICIENT?

A. Mr. Shell states that the INAC receives responses from the area teams and reviews it prior to sending it to the ATCC. This is another example of the inflated work hours.

Q. CAN YOU COMMENT ON THE TIME ALLOCATED FOR MEETINGS IN MR. SHELL'S REBUTTAL TESTIMONY?

A. Yes. In previous testimony (page 7 line 13 – 15), Mr. Shell states that the ATCC compiles the final response. In the final justification of the 20 hours allocated for the INAC, Mr. Shell states that 20 hours is reasonable if one considers the time to facilitate two or three meetings. To the contrary with the availability of e-mail and other automated systems, it seems completely unreasonable for this process to require 20 meeting hours to complete.

Q. ON PAGE 10 OF HIS REBUTTAL TESTIMONY, MR. SHELL QUESTIONS YOUR EXPERIENCE WITH THE INITIAL APPLICATION PROCESS. ARE HIS CONCERNS WELL FOUNDED?

A. No. The Space Relinquish process involves a CLEC's terminating its use of the collocation space and removing its equipment. The process is simply the reverse of an

1 initial application. Space Relinquish requires that same analysis and work activities for
2 the ILEC and the CLEC as an initial application (See Exhibit JW-4). , The example of an
3 initial application Mr. Shell uses on page 9 (lines 17 – 21) includes the same information
4 that must be provided on a space relinquish application. For example, the space
5 relinquish application must indicate the type and amount of floor space being terminated.
6 Each item of equipment that is being removed must be shown with the bay number,
7 quantity, heat dissipation and power consumption. The CLEC's BellSouth certified
8 vendor is responsible for having the CLEC's floor space removed from the BellSouth
9 floor plan drawings, removing the power breaker or fuse assignments from ERMA
10 (BellSouth's automated assignment system) as well as removing the equipment, cabling
11 and equipment labeling on BellSouth MDF and power bays. BellSouth engineers must
12 modify their engineering records to reflect the removal of equipment just as they
13 modify the engineering records for equipment installed pursuant to an initial application.

14 **Q. IS MR. SHELL CORRECT ON PAGE 9 OF HIS TESTIMONY IN STATING**
15 **THAT POWER REDUCTION AND CABLE RELATED APPLICATIONS ARE**
16 **"SUBSEQUENT APPLICATIONS".**

17 **A.** Yes. However, it is an over simplification to state that power reduction is reducing the
18 amount of DC power required by the CLEC. In practice when the CLEC reduces power
19 the BellSouth engineer must correct the power drain records of the central office and
20 adjust the power capacity of the power plant. This change could affect any plans to
21 increase the capacity of the power plant and push power expansion projects farther into
22 the future. In fact BellSouth profits from power reduction because the CLEC(s) paid a

1 prorated share of any power plant expansion that resulted from their collocation
2 activities.

3 **Q. ON PAGE 10 OF HIS REBUTTAL TESTIMONY, MR. SHELL IS CRITICAL OF**
4 **YOUR RECOMMENDED REDUCTIONS OF WORK TIMES. PLEASE**
5 **COMMENT.**

6 **A.** My 35-year career in the telecommunications industry, as outlined in my direct
7 testimony, provides the basis for my recommendations. My original position at NuVox
8 was Senior Director, Network Development in the Engineering Department. In that
9 position I was responsible for the collocation expansion and deployment of our network.

10 Other employees in the same department actually submitted the initial applications as
11 well as subsequent applications. However, I was responsible for equipment installation,
12 testing, commissioning and authorizing the release of the collocation for the installation
13 of customer services. These activities required me to be involved with all aspects of the
14 collocation application process including the following: Firm Order submission,
15 BellSouth space preparation, coordinating NuVox's vendors' work on collocations that
16 were at the Space Ready stage and obtaining sign-off by BellSouth following the
17 completion of work by NuVox.

18 Additionally, I was responsible for managing the installation, testing and acceptance of
19 61 collocations and a DMS 500 switch within BellSouth's territory. These activities were
20 completed in 63 days for an average of nearly one collocation space acceptance per day,
21 which indicates the large number of company and contract crews that were managed and
22 the amount of coordination that was required. During my thirty-five year career I have
23 been employed as a central office engineer managing engineering groups and with

1 responsibility for the operation of central offices. This covers nearly all of the functional
2 departments to which BellSouth has allocated time in processing an application. I believe
3 this experience provides a solid basis for my recommendations.

4 **Q. MR. SHELL STATES IN HIS TESTIMONY ON PAGES 10-11 THAT YOU HAVE**
5 **“PROVIDED NO REAL BASIS FOR REDUCING” THE SUBSEQUENT**
6 **APPLICATION WORK TIMES. DO YOU AGREE WITH THIS ASSERTION?**

7 A. No. Mr. Shell correctly states that the subsequent application process is largely the same
8 as the initial application process. However, there is a distinction between process and
9 actual work required by the BellSouth workgroups. For example, in a typical subsequent
10 application, the CLEC may request to increase the quantity of tie cable pairs between the
11 CLEC collocater and BellSouth. This activity requires no additional power, no additional
12 heat dissipation, and no additional floor space. It does require a BellSouth engineer to
13 allocate additional space on the Distributing Frame or in its Digital Cross Connect Bay.
14 Using the cost study proposed by BellSouth, a CLEC must pay for the efforts of
15 numerous BellSouth work groups although they are not involved in performing actual
16 work related to the Subsequent Application. The examples I provided in testimony
17 regarding the number of hours allocated to the ATCC in completing the initial application
18 apply to subsequent applications as well. The BellSouth cost study includes the same 11
19 hours for a subsequent application although the scope of the subsequent application
20 (except total space relinquish) is much smaller.

21 **Q. ON PAGES 11 AND 12 OF HIS REBUTTAL TESTIMONY, MR. SHELL**
22 **DESCRIBES THE FIRM ORDER PROCESSING FEE. IS THIS DESCRIPTION**
23 **ADEQUATE?**

1 A. No. Once again, the activities Mr. Shell lists on page 11 of his rebuttal testimony (lines
2 18–22) offer no substance as to the time requirement, frequency of occurrence and/or
3 description of activities required to process a Firm Order. Distribution is on-line and new
4 data on the Firm Order is basically limited to contact information so that updating the
5 database would not require much time.

6 **Q. ON PAGES 11 AND 12 OF HIS REBUTTAL TESTIMONY, MR. SHELL**
7 **DISCUSSES YOUR EXPERIENCE WITH THE FIRM ORDER AND**
8 **APPLICATION PROCESSES. PLEASE COMMENT.**

9 A. Again Mr. Shell argues that my experience with applications and firm orders is limited.
10 As previously stated, this shows his lack of understanding the processes internal to
11 BellSouth for the removal of a collocation. In my direct testimony, I provide examples
12 comparing the initial application and space relinquish process. Mr. Shell's statement that
13 space relinquish applications are necessary to ensure BellSouth records is correct. In fact
14 the space relinquishment application - like the initial application - requires BellSouth to
15 accomplish the same work, in reverse, as an initial application. Mr. Shell also states that
16 no coordination is required. This is incorrect. If the demand for power, HVAC, floor
17 space and distributing frame space is reduced this information must be coordinated
18 between departments. These removal activities affect the planning and engineering
19 projects in the same manner as requests for additions to these components of a central
20 office. If BellSouth fails to update engineering records to reflect these changes, then it
21 may have a great many over engineered central offices.

1 Q. ON PAGES 12 AND 13 OF HIS REBUTTAL TESTIMONY, MR. SHELL
2 QUESTIONS YOUR RECOMMENDATION TO REDUCE WORK TIMES ON
3 FROM ORDER PROCESSING. CAN YOU COMMENT?

4 A. As I have described earlier, my experience in engineering and central office operations is
5 extensive over a 35-year career.

6 Q. MR. SHELL STATES ON PAGE 13 (LINE 14 – 15 AND 20 – 21) OF HIS
7 REBUTTAL TESTIMONY THAT BELL SOUTH USES THE ACTUAL PRICE
8 THAT BEST ACCESS SERVICES CHARGES FOR KEYS “UNIQUE” TO
9 BELL SOUTH. DO YOU AGREE WITH HIS TESTIMONY?

10 A. Mr. Shell suggests that BellSouth orders unique keys for security reasons and that these
11 keys cannot be reproduced. NuVox’s keys are also unique in that they cannot be
12 reproduced. The BellSouth key is somewhat thicker but the longitudinal patterns are the
13 same. Only the cut for the individual locks are different. The keys appear to be made
14 from the same material. It is difficult to understand how one key costs \$1.98 (without a
15 volume contract) while another has a proposed cost of \$26.25 (with a volume contract).

16 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17 A. Yes.